

No. PD-0907-17

In the Court of Criminal Appeals of Texas

FILED
COURT OF CRIMINAL APPEALS
4/17/2018
DEANA WILLIAMSON, CLERK

**CHRISTOPHER ERNEST BRAUGHTON, JR.,
APPELLANT**

v.

**THE STATE OF TEXAS,
APPELLEE.**

On Petition for Review from the First Court of Appeals, No. 01-15-00393-CR

**Sworn Motion of Peter A. Patterson
for Admission Pro Hac Vice**

David H. Thompson
John D. Ohlendorf
Haley N. Proctor
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*Counsel for the National Rifle
Association of America, Inc.*

To the Honorable Judges of the Court of Criminal Appeals:

Comes Now, **Peter A. Patterson**, Movant and pursuant to provisions of the Texas Rules Governing Admission to the Bar, hereby files this sworn Motion for Admission Pro Hac Vice and, by separate motion, requests permission to appear at oral argument on behalf of the **National Rifle Association of America, Inc.** If the motions are granted, Applicant expects that his participation in this appeal will be limited to a short argument during oral argument on May 16, 2018.

1. My name is Peter A. Patterson. I am an attorney at law licensed by the State of Ohio (Bar No. 0080840) and the District of Columbia (Bar No. 998668). I am also licensed to appear before: the Supreme Court of the United States; the United States Courts of Appeals for the First, Second, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Federal, and District of Columbia Circuits; the United States District Courts for the Southern District of Ohio, the District of the District of Columbia, and the District of Colorado, and; the United States Court of Federal Claims. I am an active member in these bar associations and courts and I am in good standing in each of these jurisdictions.

2. I graduated from Stanford University School of Law. Upon graduation, I clerked for Judge Jeffrey S. Sutton of the United States Court of Appeals for the Sixth Circuit. I was admitted to the State of Ohio bar in 2006 and since my admission I have remained in good standing.

3. If this Court grants my request to be admitted pro hac vice, I will be associated with the following Texas attorney:

Mr. Brady Thomas Wyatt, III
Texas Bar No. 24008313
LAW OFFICE OF BRADY WYATT, III
3300 Oak Lawn Ave.
Suite 600
Dallas, Texas 75219
(214) 559-9115
Attywyatt@hotmail.com

4. I have never sought to appear pro hac vice before any Texas court.

5. I have not previously been the subject of any disciplinary action by a bar association or court of any jurisdiction before which I am licensed in the last five years. Nor have I been denied admission pro hac vice by any federal or state court in the last five years.

6. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the professional conduct of the members of the State Bar of Texas. I will abide by and comply with these rules so long as this proceeding is pending and I remain as counsel.

7. Attached to this motion as Exhibit A is a true and correct copy of the Non-Resident Acknowledgment Letter issued to me by the Texas Board of Law Examiners.

8. Attached to this motion as Exhibit B is a true and correct copy of Attorney Wyatt's Motion in Support of Peter A. Patterson's Application to Appear Pro Hac Vice before this Court.

WHEREFORE, Applicant requests that this Court approve this motion for the purposes of representing the National Rifle Association of America, Inc. during oral argument on May 16, 2018.

Respectfully Submitted on April 17, 2018.

Respectfully,

/s/ Peter A. Patterson

Peter A. Patterson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served upon all counsel of record, as listed below, via electronic filing, on April 17, 2018.

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Counsel for the Texas State Rifle Association

/s/ Peter A. Patterson
Peter A. Patterson

EXHIBIT A

Board of Law Examiners
Appointed by the Supreme Court of Texas

April 12, 2018

Peter A. Patterson

Via: E-Mail

Acknowledgment Letter
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: Peter A. Patterson

Case: PD-0907-17

Texas court or body: Court of Criminal Appeals of Texas

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule XIX(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule XIX(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule XIX of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Signed,



Susan Henricks
Executive Director

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EXHIBIT B

No. PD-0907-17

In the Court of Criminal Appeals of Texas

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*Counsel for the National Rifle
Association of America, Inc.*

To the Honorable Judges of the Court of Criminal Appeals:

Comes Now, **Attorney Brady T. Wyatt, III**, who presents this motion in support of Peter A. Patterson's application to appear pro hac vice before this Court in accord with Rule 19(b) of the Texas Board of Law Examiners.

1. Peter Patterson is a member of the State of Ohio Bar (Bar No. 0080840) and the District of Columbia Bar (Bar No. 998668).

2. After graduating from Stanford Law School, Peter clerked for Judge Jeffrey S. Sutton of the United States Court of Appeals for the Sixth Circuit.

3. Peter is licensed to appear before: the Supreme Court of the United States, the United States Courts of Appeals for the First, Second, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, District of Columbia, and Federal Circuits, the United States District Courts for the Southern District of Ohio, the District of the District of Columbia, and the District of Colorado, and the United States Court of Federal Claims.

4. I find Peter to be a reputable attorney and I recommend that he be granted permission to participate in this case as counsel for the National Rifle Association of America, Inc.

Respectfully Submitted on April 17, 2018.

Respectfully,

/s/ Brady Wyatt

Brady Wyatt

LAW OFFICE OF BRADY WYATT, III

Brady Wyatt

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Dallas, Texas 75219

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*Counsel for the National Rifle
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served upon all counsel of record, as listed below, via electronic filing, on April 17, 2018.

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Counsel for Christopher Ernest Braughton, Jr.

/s/ Brady Wyatt
Brady Wyatt